

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
JASPER DIVISION

## CIVIL ACTION NO. 2015

Wayne Coatney,

Plaintiff,

v.

Super 8 Worldwide, Inc., a corporation doing business in Alabama,  
Wyndham Hotel Management, Inc., a corporation doing business in  
Alabama and Super 8 Ogallala, a Nebraska business entity

Defendant.

COMPLAINT

1. Plaintiff, Wayne Coatney, is an Alabama resident who  
is over the age of nineteen (19) years.

2. Plaintiff is informed and believes and thereon alleges  
that at all material times Defendants, Super 8 Worldwide, Inc.,  
and Wyndham Hotel Management, Inc., are corporations doing  
business in the Northern District of Alabama by operating hotels  
and motels under the trade name "Super 8". These entities will  
be referred to as the "Wyndham Defendants" herein.

3. Plaintiff is informed and believes and thereon alleges  
that at all material times Defendant, Super 8 Ogallala is an  
entity operated by the Wyndham Defendants doing business in  
Nebraska.

4. The amount in controversy exceeds \$75,000.

5. On or about the 21<sup>st</sup> day of February, 2013, Plaintiff,  
while an invitee, was upon the premises of the Defendants in  
Ogallala, Nebraska, when he fell and was injured.

6. Plaintiff's said fall was the proximate result of the named Defendants' negligence and/or wantonness in that the named Defendants, with knowledge that a dangerous condition existed due to the fact that a snowstorm had covered layers of ice in the Defendants' parking lot, allowed said snow to unreasonably cover the dangerous ice conditions and without warning Plaintiff of the ice or the danger it posed.

7. As a proximate result of the named Defendants' said negligence and/or wantonness, Plaintiff was caused to suffer the following injuries and damages:

He was caused to suffer a broken leg and numerous injuries to his leg; he was caused to incur medical bills for treatment of his aforesaid injuries and damages, caused to miss employment for several months and will be caused to endure pain and suffering and incur medical expenses in the future in an effort to heal and cure his said injuries.

WHEREFORE, PREMISES CONSIDERED, Plaintiff demands judgment against the named Defendants described in the caption, for compensatory damages and interests and costs of court in an amount to be determined by a struck jury.

/s/Scott Hunt

Scott Hunt  
Attorney for Plaintiff  
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Hamilton, Alabama 35570  
(205) 921-2466 phone  
(205) 921-2452 fax

PLAINTIFF DEMANDS A TRIAL BY STRUCK JURY.

SERVE DEFENDANTS VIA CERTIFIED MAIL AT THE FOLLOWING  
ADDRESS:

SUPER 8 WORLDWIDE, INC.  
CORPORATE CREATURES NETWORK, INC.  
6 OFFICE PARK CIRCLE #100  
MOUNTAIN BROOK, ALABAMA 35227

WYNDHAM HOTEL MANAGEMENT, INC.  
CORPORATE CREATURES NETWORK, INC.  
6 OFFICE PARK CIRCLE #100  
MOUNTAIN BROOK, ALABAMA 35227

SUPER 8 OGALLALA  
500 EAST A ST. SOUTH  
OGALLALA, NE 69153